

# **NORTHWEST MANAGEMENT FRAMEWORK PLAN EVALUATION-2002**

## **Introduction and Purpose**

The Northwest Management Framework Plan (MFP) was completed in 1982. Since completion of the plan there has been no maintenance of the plan, including plan amendments or revisions. This is the first evaluation of the MFP. BLM planning regulations require periodic evaluation of land use plans (43 CFR 1610.4-9). BLM's Report to the Congress: Land Use Planning for Sustainable Resource Decisions (2000), promised completion of comprehensive evaluations for all land use plans by the end of 2002.

Land use plans are evaluated to determine the status and continued applicability of planning decisions. This MFP evaluation determines the scope of the work necessary to upgrade the land use plan for the Northwest planning area. The evaluation also indicates shortcomings in the BLM's implementation and maintenance of the MFP.

## **Methodology and Scope**

The scope of the plan and evaluation is management of the land and resources on lands within the Northwest planning area. This includes prescriptions, mitigation, and decisions made by the MFP or subsequent activity plans.

In April, 2002, planners from the Alaska State Office and NFO met with the Northwest Team to explain the process and to provide worksheets with MFP topics for review during the evaluation. The evaluation consists of three basic steps:

- 1) NFO derived and listed the topics to be evaluated from the proposed actions of the MFP and the decision statements in the ROD.
- 2) Specialists on the Northwest Team determine whether decisions have been implemented, the effectiveness of the decisions, and subsequent planning actions. They also identify new issues. They document their review using worksheets containing nine standard questions taken directly from pages V-2 and V-3 of the Land Use Planning Handbook. The evaluation worksheets are attached to this document.
- 3) The NFO Planning and Environmental Coordinator compiled information from the Northwest Team's worksheets to write this report.

BLM H-1601-1 Land Use Planning Handbook (11/22/00) Part V and Appendix C provide guidance on the evaluation process and content.

## **Conclusions /Findings**

### **1. MFP decisions were not all implemented.**

Lands Objective 5 has not been fully implemented even though it remains valid. The objective described three roads/transportation corridors that were needed, however only one road has been developed. The objective also called for easement acquisition, and while still necessary, has not been done.

Lands Objective 6 called for the exchange of lands when there was a public benefit. To date no exchanges have been suggested. Additionally this objective needs further work prior to being implemented because specific tracts have not been identified for disposal and acquisition through exchange which is required by BLM guidelines.

Wildlife-Terrestrial Objective 2 has not been implemented and probably is no longer valid. The objective called for the protection of crucial wildlife habitat and mitigate competing uses, and to allow fire under prescribed conditions. There has been no identification of crucial habitats or development of appropriate Habitat Management Plans. Muskox and caribou distribution has changed drastically since the MFP was completed so validity of this section of the MFP is questionable. Additionally, no work on prescribed fire planning in support of habitat management has been done, and this section is not in conformance with Appendix C for fire management or the Federal Wildland Fire Management Policy.

### **2. Some MFP decisions remain valid.**

Lands Objective 2 allows for hot springs leases and communication sites. While no hot spring leases have been issued and only 6 communication site rights-of-ways have been issued, the potential need is still there and the decision remains valid.

Lands Objective 4 called for withdrawal review in the planning area. So far almost half of the withdrawals have been terminated after review and it is still a valid decision to have an ongoing withdrawal review for the planning area.

Cultural Resources Objective 1 specified the need to inventory archaeological and historical sites, complete the CRES evaluation for all known cultural sites, and to mark and maintain the Iditarod Trail. These tasks have been implemented and are continuing as needed.

Range Objective 4 calls for avoiding conflicts between reindeer and caribou on winter ranges, and to develop allotment management plans that include proper grazing systems coupled with fire management. While some of this objective has not been fully implemented, much of it has and the actions are still valid.

Recreation Objective 1 has almost been completely implemented and the decisions are still valid. Those portions of the objective that have been implemented are: monitoring of recreation in the

Imuruk Basin Subunit, allowing airstrip construction as part of cabin site leases (no airstrips have been requested), and to keep the primitive values along the Koyuk and Squirrel rivers. Only the decision to construct a shelter cabin on the Iditarod Trail near Ungalik has not been implemented.

### **3. Some MFP decisions are no longer valid or need additional evaluation.**

Minerals Objective 2 opened all areas of public land to oil and gas leasing, coal and oil shale exploration and leasing, and the disposal of salable minerals. Due to changes in the political climate in the area and the lack of infrastructure, this decision needs to be reevaluated through the public process.

Recreation Objective 2 addressed having the option to impose “ORV” restrictions if necessary. While this objective has been implemented on a site specific basis, there has been no comprehensive OHV planning done for the planning area. The plan should be amended or revised to include the OHV designations now required by BLM policy.

Watershed Objective 1 calls for maintaining water quality in accordance with the Alaska Water Quality Standards. To do this permitting for any off road vehicle use for vehicles in excess of 2,000 pounds was required and water rights for BLM uses were to be reserved. Off road vehicle uses are being addressed through the NEPA process but this falls short of current OHV guidelines, and the decision to obtain water rights needs to be reevaluated through the public process.

### **4. There are new issues affecting this planning area.**

Since completion of the MFP the Koyuk river was not designated as wild and scenic, therefore management of the river should be looked at through the public process by amending or revising the plan.

Recently an EIS for the Squirrel River was completed and the river was not recommended for designation as a wild and scenic river. Management of the river should be revised after the public process is followed through amendment or revision of the MFP.

Salmon stocks have been decreasing and in 1999 a Chum salmon disaster was declared for Norton Sound. Many of the salmon stocks around Nome are depleted. In 1996 the Norton Sound/Bering Strait Regional Comprehensive Salmon Plan was completed. BLM land use planning should be revised or amended to address the current situation and consider the new salmon planning in the area.

Visual Resource Management (VRM) was not addressed in the MFP and should be part of the BLM management in the area.

The Western Arctic Caribou Herd has increased in size and there has been a significant reduction in lichen cover in the winter range.

The musk ox population has increased greatly since the MFP was completed and BLM planning should be updated to address this issue.

There has been a great deal of new planning in the planning area since the MFP was completed and this new planning (federal, state, local, and native corporation) should be considered in BLM planning.

A new Borough was formed since the MFP was written and BLM planning should consider the needs and planning of the new Borough.

#### **5. There are new standards.**

The Northwest MFP does not include the draft land health standards and guides for Alaska.

#### **6. There are new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan.**

The MFP only briefly discussed fire in the context that prescribed fire could be used as a tool for habitat enhancement. The MFP needs to be amended or revised to include the new National Fire Policies and the new National Fire Plan.

A plan decision called for a withdrawal program to be developed in order to acquire lands for resource reasons. The validity of this decision is questionable due to new policies and guidance, as well as the ownership patterns in the area have changed dramatically since completion of the plan. Inventories would be needed to determine those areas that are to be acquired as well as those areas that would be disposed of. Individual tracts of land would then need to be specifically identified for acquisition or disposal through exchange. This type of allocation decision would most likely require a revision of the plan.

There have been significant changes regarding the management of migratory birds that has not been addressed in the MFP. Executive Order 13186 now requires formal consultation when ever an action may result in the taking of migratory birds, intentionally or otherwise. This consultation and coordination should be addressed in BLMs land use planning.

Currently, the plan does not discuss wilderness or wild and scenic rivers. Due to a Secretarial Order wilderness review is now a requirement. Additionally, because of a settlement with American Rivers in a court case, wild and scenic rivers need to be examined in the planning area.

There are areas within the planning area boundaries that are federal lands but have not been planned for. These are generally selected lands, but now that most selections are completed, the remaining lands should be included in a land use plan.

## **Discussion**

The evaluation team completed evaluation worksheets for each of the decision topics in the MFP. The worksheets contained the nine evaluation questions required by the BLM planning handbook. The evaluation worksheets are attached to this document.

Upon review of the worksheets it is clear that many of the decisions have not been implemented. It is clear that many of the decisions should be reevaluated to determine if they are still valid. There are new issues that have developed since completion of the plan that need to be addressed in BLMs land use planning.

There are new issues that will require a major effort to incorporate into the MFP and will probably require an EIS to analyze. Since there are new and significant issues coupled with the fact that many of the current decisions are most likely no longer valid, then it seems as if a new RMP should be developed for the Northwest planning area.

## **Recommendations**

The Northern Field Office should:

1. Schedule a new planning start (RMP) in the Northwest planning area as soon as time and budget allow. Establish the priority for new planning starts and plan revisions/amendments when the NFO completes all six land use plan evaluations.
2. Develop priorities for implementation of those MFP decisions that are still valid. The Northern Field Office should continue to request funding for all specific actions deemed still valid and implement the decisions when personnel and funding are available.
3. Develop a strategy for implementation and monitoring of the valid portions of the plan until such time as a new plan can be developed.
4. Maintain the plan and begin noting information that can help determine issues and the scope of the plans revision. Maintenance would include documenting the implementation actions that have occurred since the plan was completed. Implementation actions that were not initiated should be documented as well as the reasons why.

## Evaluation Worksheet

**Issue:**

Lands: Objective 1

Provide a program for settlement on public lands in Northwest Alaska

**Comment 5/24/2002: Settlement laws expired in 1986.**

**ROD Reference:**

L -1.1

**Proposed Actions:**

Recommendation dropped

- (1) Are actions outlined in the plan being implemented?
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.
- (4) Do decisions continue to be correct or proper over time?
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.

- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?
- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

## Evaluation Worksheet

### Issue:

Lands: Objective 2

Provide a non-settlement claim program of authorizing use of and sale of public lands for private and commercial uses

### ROD Reference:

L-2.2, 2.3

### Proposed Actions:

2.2- Allow commercial Hot Springs Leases

2.3- Set aside certain high peaks for communication sites

- (1) Are actions outlined in the plan being implemented?  
**Yes. No hot springs leases issued. Approximately 6 rights-of-ways granted for communication sites.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**No.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**Yes. No allocations, constraints, or mitigation measures identified in RMP. Addressed individually with each authorization.**
- (4) Do decisions continue to be correct or proper over time?  
**Yes.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**Yes. There were no other plans in 1982. A new borough has formed since 1982. The various private and government landowners in the planning area have written plans since 1982.**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**No.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For



example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.

**No. The present case by case approach to these authorizations is working.**

- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**No. The increasing use of satellite communications is reducing the need for mountaintop communications sites. The area is too sparsely populated for cell phones to be practical; there has been no demand for cell phone sites on public land.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**No.**

## Evaluation Worksheet

**Issue:**

Lands: Objective 3

Identify priority lands for State selection or exchange

**4/24/2002 comment: The period for filing state selections is past. An exchange program is unlikely in light of pending conveyances.**

**ROD Reference:**

L- 3.1

**Proposed Actions:**

3.1- Recommendation dropped

- (1) Are actions outlined in the plan being implemented?
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.
- (4) Do decisions continue to be correct or proper over time?
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.
- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

## Evaluation Worksheet

### Issue:

Lands: Objective 4

Review public land withdrawals for use and suitability

### ROD Reference:

L- 4.1

### Proposed Actions:

4.1- Withdrawal Review for all withdrawn lands in the planning area

- (1) Are actions outlined in the plan being implemented?  
**Yes. Approximately half the withdrawals on the list have been terminated.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**No.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**Yes. No allocations, constraints, or mitigation measures identified in the RMP. Addressed individually with each review.**
- (4) Do decisions continue to be correct or proper over time?  
**Yes.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**Yes. There were no other plans in 1982. A new borough has formed since 1982. The various private and government landowners in the planning area have written plans since 1982.**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**No.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.  
**No. The present case by case approach to withdrawals is working.**

- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**No.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**No.**

## Evaluation Worksheet

### Issue:

Lands: Objective 5

Make public lands accessible

### ROD Reference:

L- 5.3, 5.4

### Proposed Actions:

- 5.2- Develop a public information program for ANCSA easement locations and uses.
- 5.3- Protect these potential transportation corridors by not allowing conflicting land uses.
  - Deering to Taylor Highway (winter trail)
  - Ambler Mining District east to Dalton Highway (access road)
  - Red Dog Mine to Chukchi Sea (access road)
  - Delong Mining District to Nome (railroad)
- 5.4- Develop ATROW program for acquiring easements to BLM administered public lands

- (1) Are actions outlined in the plan being implemented?  
**5.2 Yes. A paper and microfilm system is in place. A web-based system is being developed.**  
**5.3 Yes. One of the three roads identified (#3, the Red Dog Haul Road) has been built. The remaining two are unlikely to be built in the life of this plan.**  
**5.4 No. Informal inventories have been done, but no funding has been received and no easements acquired.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**No.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**Yes. No allocations, constraints, or mitigation measures identified in RMP. Addressed individually with each review.**
- (4) Do decisions continue to be correct or proper over time?  
**Yes.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**Yes. There were no other plans in 1982. A new borough has formed since 1982. The various private and government landowners in the planning area have written plans since 1982.**

- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**No.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.  
**Yes. Easement management and acquisition program needs to be elevated.**
- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?  
**Yes. Easement acquisition inventories are out of date and need to be updated.**
- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?  
**The state director has adopted a policy of being more aggressive in easement management.**

## Evaluation Worksheet

### Issue:

Lands: Objective 6

### ROD Reference:

L- 6.1

### Proposed Actions:

6.1- Exchange lands when public benefit can be recognized

- (1) Are actions outlined in the plan being implemented?  
**No.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**No.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**Yes. No allocations, constraints, or mitigation measures identified in RMP. Addressed individually with each review.**
- (4) Do decisions continue to be correct or proper over time?  
**Yes.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**Yes. There were no other plans in 1982. A new borough has formed since 1982. The various private and government landowners in the planning area have written plans since 1982.**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**No.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.  
**No. Land ownership patterns are in flux due to pending entitlements.**
- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?



**Yes. Any inventory should focus on lands to be acquired for specific resource reasons. An extensive inventory of lands to exchange to consolidate ownership is premature since ownership patterns are in flux due to pending entitlements.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?  
**No.**

## Evaluation Worksheet

**Issue:**

Minerals: Objective 1

**ROD Reference:**

M -1.1, 1.2

**Proposed Actions:**

Recommendations dropped

- (1) Are actions outlined in the plan being implemented?  
**No, political climate was unfavorable. The issue transcended the scope of the MFP and became a Statewide issue even fostering some national debate. Responsibility for identifying and locating RS2477 was shifted to the State of Alaska.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**No.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**Not applicable.**
- (4) Do decisions continue to be correct or proper over time?  
**Yes, they would have been.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**Native corporations continue to solicit mineral development on corporation lands. The State of Alaska while targeting mineralized areas for selection has not changed, though due to budget constraints their focus has been diverted to the Interior region the State. Federal agencies continue to discourage mineral development by a plethora of regulations in the guise of generating revenue from publically owned mineral resources.**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**Not on public lands.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For

example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.

**Trail identification, designation and development of transportation corridors are still essential to the exploration and development of mineral resources on public lands. The designation of ACEC's while protecting biological resources and existing environments generally restrict and prohibit development of access to as well as through traffic.**

- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**Until State land selections are adjudicated no new inventories are warranted though existing inventories which include areas where federal retention of lands and their resources are probable are woefully out of date.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**Not as concerns identification and certification of historic roads and trails.**

## Evaluation Worksheet

### Issue:

Minerals: Objective 2

Make public lands available to mineral exploration, entry, leasing, and development

### ROD Reference:

M -2.2, 2.3, 2.4, 2.5

### Proposed Actions:

2.2- Review withdrawals closing lands to mineral entry and modify, amend or revoke those not serving the original purpose of the withdrawal

2.3- Open all areas of public land to oil and gas leasing according to the pending 1008 study with certain conditions for subunits

2.4- Permit exploration and leasing of coal, oil shale, geothermal, and other leasable mineral resources

2.5- Permit the disposal of salable minerals

(1) Are actions outlined in the plan being implemented?

**2.2 The 1008 Seward Peninsula identified withdrawals of potential mineral lands not selected and reopened them. The National Wildlife Federation sued on one large chunk and shut down minerals exploration. Then the next round of selections by the State of Alaska came along and remaining lands, including those reopened were over selected by the State and thereby closed to entry and location.**

**2.3 Upland oil and gas resources are not competitive in the current world market compared with North Slope oil fields. The lack of a strong local market and absence of even a rudimentary infrastructure (due to political and economic reasons) are deleterious factors in their development.**

**2.4 Identified other feasible mineral resources of significant potential have been conveyed to State and Native interests. Again these resources are not competitive in the world market and lack strong local markets to encourage development interests.**

**2.5 Salable minerals are widespread throughout the region but due to the lack of developed infrastructure and complex land ownership patterns which are a further bar to development derive their value from local projects dependent on State and Federal grant monies. These local projects are centered around established villages where immediately surrounding lands have been conveyed out of Federal ownership.**

(2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?

**No. They are not realistic in the current political climate and unsettled land ownership questions. The MFP was written with the underlying philosophy of non-renewable resource development which even in 1983 was changing. Present**

**day management philosophy has moved away from the view of minerals as a resource and replaced it with the view that it is an undesirable impact to the environment of first world countries.**

- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**Unknown. The unsettled land ownership questions have not permitted allocations, constraints and mitigation developed in the Plan to be tested. Additionally these developments do not reflect the present increasingly restrictive regulatory climate which represents a dramatic change from the early 1980's when this plan was finalized.**
- (4) Do decisions continue to be correct or proper over time?  
**No. the desired outcomes no longer reflect the political direction concerning management of mineral resources on public lands.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**Native and State plans, the ownership of mineral resources, remain unchanged,, though at least in the case of the State of Alaska their appetite for mineral resources has outstripped their ability to manage these resources forcing them to limit and geographically prioritize their attentions to the Interior region where supporting infrastructure is better developed. The Federal agencies plans have move dramatically away from development friendly regulation and multiple use management and tipped heavily in favor of preservation of biological resources and environmental conditions.**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**No. at least not on lands that we suspect will ultimately remain in Federal ownership once selection claims have been adjudicated.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.  
**Not applicable here. ACEC designation generally restrict and close areas to mineral exploration and development.**
- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?  
**Yes, though until State selections are adjudicated we cannot be sure of what lands will truly remain in Federal ownership. The locatable mineral resources potential of what we suspect will remain in Federal lands are not known. Fluid minerals and**

**other leasables lack the developed infrastructure and market competitiveness to encourage private development interests.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?
- The regulatory climate addressing exploration and development of locatable mineral resources on public lands has changed becoming more restrictive since this plan was finalized. No fundamental changes in fluid minerals and other leasable minerals since plans inception, but again many of these resources have transferred out of Federal hands, are of such limited value and/or are remotely located and lack of significant local markets.

## Evaluation Worksheet

**Issue:**

Cultural Resources: Objective 1

Protect archaeological and historical sites according to the BLM Cultural Resource Evaluation System (CRES).

**ROD Reference:**

CR- 1.1, 1.2, 1.4

**Proposed Actions:**

1.1- Inventory archaeological and historical sites. Encourage university and private inventories under permit and applicants for surface disturbing uses will be required to furnish the needed inventories

1.2- Complete CRES evaluation for all known cultural resources and for new resources as they are located

1.4- Mark and maintain Iditarod Trail. Agreements with Native Corporations are recommended

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(1) Are actions outlined in the plan being implemented?

**Yes**

(2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?

**Not really**

(3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.

**N/A**

(4) Do decisions continue to be correct or proper over time?

**Yes**

(5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?

**Yes. Land status has changed significantly since the MFP was signed, and plans have been developed for neighboring parks, monuments and refuges that were simply not in place at the time the Northwest MFP was developed.**

(6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?

**Yes. There have been twenty years of new developments that provide new data for a NEPA analysis (something that was not part of the planning process in the old format, by the way).**

(7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.

**At the time of the MFP very little was known about cultural resources on BLM managed lands in the area. We have at least begun to scratch the surface now, as a result of completion of the first round of inventory as called for in the MFP. As we now know more about resources present, there is an opportunity to develop recommendations that address these resources.**

(8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**Yes. Cultural resource inventories are also required by Section 110 of the National Historic Preservation Act.**

(9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**Yes. The Native American Graves Protection and Repatriation Act (NAGPRA) was passed in 1990, providing additional guidance regarding Native coordination. There have also been significant regulatory changes in the implementing regulations for the National Historic Preservation Act.**



## Evaluation Worksheet

### Issue:

Forest Products: Objective 1

Manage forest lands to provide sustained yield of firewood, houselogs, and other products

### ROD Reference:

F- 1.1

### Proposed Actions:

1.1- Issue permits for the harvesting of forest products

- (1) Are actions outlined in the plan being implemented?  
**Yes. Demand is low, but within a ten year period (1991 - 2001), two permits were issued for house log harvest in the Squirrel River subunit. Two additional inquiries were initiated during this same period for firewood harvest, but later withdrawn.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**Basic objectives are stated, but specific goals or standards are not.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**No allocations, constraints or mitigation measures have been developed.**
- (4) Do decisions continue to be correct or proper over time?  
**Yes.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**No.**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**No.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.  
**No.**
- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**No forest inventory has been done to assess amount, distribution or species of commercial or noncommercial timber in the Northwest MFP area. Given the low demand, such an inventory would have low priority for funding, but may be the prudent thing to do when possible.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**BLM Land Use Planning Manual, Appendix C, Forestry**

**BLM - Alaska Statewide Land Management Standards and Guidelines**

## Evaluation Worksheet

### Issue:

Range: Objective 1

Encourage proper utilization of range by livestock

### ROD Reference:

R- 1.1, 1.4

### Proposed Actions:

1.1- Adjust reindeer allotment boundaries and designate non-use to avoid conflict with caribou winter ranges

1.4- Develop allotment management plans that include proper grazing systems and fire management

(1) Are actions outlined in the plan being implemented?

**1.1: Initially, yes. The Buckland Valley HMP was completed in March 1983. However, from approximately the late 1980's/early 1990's to the present, caribou began moving onto the Seward Peninsula in increasing numbers during spring and fall migration, and during winter. The scale of these movements (10,000 to 20,000 caribou during some periods), plus their frequency and extent, precluded a simple solution of allotment boundary adjustment. Caribou disrupted and dispersed reindeer on seven reindeer grazing allotments in the eastern half of the Peninsula, and those herders have lost most of their reindeer. The six remaining herders in the western half have also lost some to many of their reindeer.**

**1.4: Three of the six herders have allotment management plans (fairly informal), one is in progress, one has not initiated a herding operation, and one herder does not have an allotment management plan. With most herders having very few reindeer, impacts on their ranges are mainly a function of caribou use.**

**1.4: Some portion of the reindeer range under permit to BLM is evaluated annually during summer fieldwork to monitor lichen utilization and condition, and to confer with herders.**

**1.4: No studies have been done on range response to varying levels of grazing intensities.**

**1.4: The UAF Reindeer Research program recently set up two 30m x 30m exclosures long the Fish River at the southern edge of McCarthy's Marsh to provide quantitative data on lichen tussock tundra (winter range) protected from grazing by caribou. They also plan to run some simulated grazing studies with haltered reindeer on summer range near McCarthy's Marsh. Data from both studies will**

assist BLM in obtaining information on range response to grazing at various levels of intensity.

**1.4:** The Ulukluk Creek fire effects transects established in 1981 were re-read in 1982-84, and again in 1995. They are scheduled to be evaluated again in 2003 or 2004.

- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?

**1.1:** Basically, yes, in reference to maintaining a favorable balance between allowing reindeer grazing and protecting habitat for wildlife use, with close coordination with State ADF&G. However, many of the details contained in the 1982 MFP are no longer pertinent.

**1.1 and 1.4:** Basic objectives are stated. Goals and standards should be developed.

- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.

**1.1:** They were effective before large-scale change in caribou movements and population size. Since the mid 1990's the Northwest Team has eased out of monitoring caribou distribution and has deferred to ADF&G. However, the 20 permanent vegetation transects BLM established in the Buckland River valley and northern Nulato Hills in 1981 to monitor range condition were re-read in 1995 and added to in 1996 and 1997. A new round of transect readings is scheduled for FY03-05.

**1.4:** The desired outcomes are described in brief, general terms. No mitigation measures are identified.

- (4) Do decisions continue to be correct or proper over time?

**1.1:** The concept of attempting to avoid caribou and reindeer conflicts is still valid. For example, John Walker would like to utilize his grazing allotment on the Baldwin Peninsula, but he, BLM and ADF&G all agree that he should delay this venture until the Western Arctic Caribou Herd declines significantly in size.

**1.4:** The concept of developing allotment management plans which include proper grazing systems and appropriate fire management remains valid.

**1.1 and 1.4:** However, the MFP does not meet the criteria outlined in the current Land Use Planning Manual, Appendix C, for either Livestock Grazing (some uncertainty here as to how reindeer grazing fits in with these regulations) or Fire Management.

- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?

**1.1: NANA no longer owns or manages a reindeer herd. Management concern over the Western Arctic Caribou Herd (WACH) has moved into the public sphere with the formation of the WACH Working Group, representing many diverse interests State and federal agencies, Native and tribal groups, private guides, outfitters and transporters, environmental organizations, state and federal advisory committees and councils).**

**1.4: BLM, DNR and NPS signed an IA in 1997 to simplify the grazing permit renewal process for Seward Peninsula reindeer herders. BLM has primary responsibility for permit administration on six grazing allotments, based on proportion of BLM-managed lands within those allotments. This IA is being revised and renewed in 2002, and converted to an MOU.**

- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?

**1.1 and 1.4: Yes - there has been a significant increase in the size and distribution of the Western Arctic Caribou Herd (WACH), and a measurable decline in average lichen cover in important caribou winter range.**

- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.

**1.1 and 1.4: MFP revision is necessary.**

- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**1.1: No.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**1.1 and 1.4: The MFP is not in conformance with the Federal Wildland Fire Management Policy or the current BLM Land Use Planning Manual.**

## Evaluation Worksheet

### Issue:

Recreation Management: Objective 1

Provide recreational opportunities appropriate to the needs of visitors

### ROD Reference:

RM- 1.1, 1.2, 1.3, 1.4

### Proposed Actions:

- 1.1- Conduct visitor use surveys and monitor recreation use in the Imuruk Basin Subunit
- 1.2- Allow airstrip construction as a part of cabin site leases
- 1.3- Maintain primitive values on the Koyuk and Squirrel River until a decision is reached on the Wild and Scenic River designations
- 1.4- Construct a trail shelter on the Iditarod Trail near Ungalik

- (1) Are actions outlined in the plan being implemented?
  - 1.1 Yes. Recommendation for casual monitoring has been implemented.**
  - 1.2 Yes. No requests for airstrips have been received.**
  - 1.3 Yes. Koyuk River not designated wild and scenic. Squirrels River recommended not to be wild and scenic. No actions inconsistent with maintaining primitive values have been authorized.**
  - 1.4 No. Shelter cabins have been authorized, but not at this location.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**No.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**Yes. No allocations, constraints, or mitigation measures identified in RMP. Addressed individually with each review.**
- (4) Do decisions continue to be correct or proper over time?  
**Yes.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**Yes. There were no other plans in 1982. A new borough has formed since 1982. The various private and government landowners in the planning area have written plans since 1982.**

- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?

**No.**

- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.

**Yes. The Squirrel River has been receiving increasing use and may benefit from a plan to manage user conflicts.**

- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**No.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**No.**

## Evaluation Worksheet

### Issue:

Recreation Management: Objective 2

Develop an off-road vehicle plan for areas where conflicts, resource damage or other problems are occurring.

### ROD Reference:

RM- 2.1

### Proposed Actions:

2.1- Retain option to place ORV restrictions if necessary

- (1) Are actions outlined in the plan being implemented?  
**Yes.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**No.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**Yes. No allocations, constraints, or mitigation measures identified in RMP. Addressed individually with each review.**
- (4) Do decisions continue to be correct or proper over time?  
**Yes.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**Yes. There were no other plans in 1982. A new borough has formed since 1982. The various private and government landowners in the planning area have written plans since 1982.**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**No.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.  
**An OHV plan may be appropriate for the Squirrel River and other areas.**



- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**No.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**A national policy has been adopted of doing local OHV plans.**

## Evaluation Worksheet

### Issue:

Visual Resources: Objective 1

Maintain visual resource quality within the planning unit

### ROD Reference:

VR- 1.1

### Proposed Actions:

Recommendation dropped

- (1) Are actions outlined in the plan being implemented?  
**No actions proposed in the plan.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**Yes there is an objective to maintain visual resource quality. This is addressed on a case-by-case basis through the NEPA process.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**No allocations, constraints or mitigation measures are defined**
- (4) Do decisions continue to be correct or proper over time?  
**No decisions made. Do not meet requirements of Appendix C of the planning manual**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.
- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?  
**Yes. Need to identify VRM classes in the new plan. To do this may require some inventory. Some of the needed information can be obtained through scoping meetings and compiling existing data.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**Updated planning manual requires that VRM classes be designated in the plan.**

## Evaluation Worksheet

### Issue:

Watershed: Objective 1

Maintain water quality in accordance with the Alaska Water Quality Standards

### ROD Reference:

W- 1.2, 1.5

### Proposed Actions:

1.2- Require a permit for off road uses of vehicles weighing more than 2,000 lbs

1.5- Secure water rights for BLM uses such as recreation facilities and admin sites

- (1) Are actions outlined in the plan being implemented?  
**1.2 - Yes, permits are required for ORV over 2000 lbs.**  
**1.5 - No water rights reservations have been made since implementation of the MFP.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**No, generally speaking, Alaska Land Health Standards for watershed function and water quality need to be incorporated into the plan revision.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**Yes, by addressing off road uses by vehicles over 2000 lbs in the NEPA review process, erosional effects are mitigated by limiting use to specific stipulations.**
- (4) Do decisions continue to be correct or proper over time?  
**Yes.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**Not that I'm aware of.**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**Only if the BLM Alaska Land Health Standards are incorporated into the NEPA process.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.

**Current management practices will suffice for these two particular elements of the watershed section of the NW MFP.**

- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**No.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**As mentioned previously, implementation of BLM Alaska's Land Health Standards into the NEPA process will significantly structure the watershed section of the revised plan, at the very least.**

## Evaluation Worksheet

**Issue:**

Wildlife-Aquatic: Objective 1

Maintain existing quality of fishery habitats

**ROD Reference:**

WA- 1.1, 1.2

**Proposed Actions:**

Recommendations dropped

- (1) Are actions outlined in the plan being implemented?  
**NA**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**No. In 1988, BLM's Norton Sound Aquatic Habitat Management Plan was completed. This document was a comprehensive review of the existing data pertaining to fisheries and aquatic habitat in northern Norton Sound at the time. Definitive goals and objectives were identified. The plan also established a field work schedule to address data gaps. Unfortunately, due to the vagaries of the budget process and shifting political priorities, much of the proposed work was never completed.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**NA**
- (4) Do decisions continue to be correct or proper over time?  
**NA**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**In 1996, the Norton Sound/Bering Strait Regional Planning Team developed the Norton Sound/Bering Strait Regional Comprehensive Salmon Plan. This plan essentially sets salmon production goals to be achieved by 2010 by improved monitoring, research in support of production estimates, rehabilitation of affected habitats, and restoration of depleted populations through the use of in-stream incubators.**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?

**In 1999, a chum salmon disaster was declared for Norton Sound. Salmon stocks in the seven streams surrounding Nome have extremely depleted salmon stocks, particularly chum salmon, although coho, king, and pink salmon stocks are also of concern. Any actions that affect salmon habitat or populations are under increased scrutiny.**

- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.  
**New opportunities exist for data gathering and monitoring that are not identified in the Norton Sound Aquatic HMP.**
- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?  
**The Fish River watershed has come under increased fishing pressure due to the declining salmon stocks near Nome. A cooperative inventory and monitoring of the salmon produced in the drainage is warranted. Issues have been identified, willing partners have been contacted, and an operational plan has been developed to initiate the project. All that remains is to get the funding through the Challenge Cost Share program.**
- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?  
**BLM Alaska's Land Health Standards**

## Evaluation Worksheet

**Issue:**

Wildlife-Aquatic: Objective 2

Where appropriate, provide access to fish harvest areas on public lands for subsistence and sport use

**ROD Reference:**

WA- 2.1

**Proposed Actions:**

Recommendation dropped

- (1) Are actions outlined in the plan being implemented?  
**NA, recommendations dropped.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**NA**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**NA**
- (4) Do decisions continue to be correct or proper over time?  
**NA**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**No**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**Access to fishery resources isn't the issue in Norton Sound, availability of the resource, or lack thereof, is.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.  
**No.**



- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**No.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**Not that I'm aware of.**

## Evaluation Worksheet

### Issue:

Wildlife-Terrestrial: Objective 1

Resolve conflicts between livestock and wildlife

### ROD Reference:

WT- 1.1

### Proposed Actions:

1.1- Screen new reindeer grazing permit applications for potential conflicts with wildlife and reject applications where significant conflicts are likely to occur

1. Are actions outlined in the plan being implemented?  
**Yes, new applications are being screened.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**Yes.**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**Yes.**
- (4) Do decisions continue to be correct or proper over time?  
**Yes.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**NANA no longer owns or maintains a reindeer herd. As of 1995, BLM cooperatively manages reindeer grazing permits on the Seward Peninsula through an Interagency Agreement with Alaska State DNR and the NPS.**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**Yes changes in the size and distribution of western arctic caribou herd.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.  
**There is an opportunity to consider permanently closing the McCarthy's Marsh and Upper Kuzitrin River areas to reindeer grazing through a plan revision, amendment or new plan. The areas are currently vacant. Three applications for**

**McCarthy's Marsh have been denied in the past and appealed to IBLA. In all 3 cases IBLA upheld BLMs decision to deny the applications based on concerns for wildlife habitat and populations. An application for the upper Kuzitrin was denied based on wildlife concerns. This issue has the potential to resurface periodically. For example, as of May 2002, an applicant formerly denied a reindeer grazing permit in McCarthy's Marsh may submit another application. This individual has discussed the possibilities with BIA, and BIA has discussed various options with BLM concerning the request. A formal application has not yet been received.**

- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**The current level of Range inventory/monitoring is probably adequate.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**There has been various changes in policy and regulation due to Range Reform efforts throughout the Bureau. It is questionable how much this applies to the reindeer grazing program as it is under different regulations than livestock grazing.**

## Evaluation Worksheet

### Issue:

Wildlife-Terrestrial: Objective 2: Maintain or improve the quality of wildlife habitats.

### ROD Reference:

WT- 2.1, 2.2

### Proposed Actions:

- 2.1- Protect areas of crucial wildlife habitat. In other areas, competing uses should be mitigated so as not to significantly alter the population of the species
- 2.2- Allow fire under prescribed conditions

- (1) Are actions outlined in the plan being implemented?

**2.1:Yes. Primarily because there is not much going on out in the NW area in the way of land use permits or development. I don't know if crucial habitats were ever identified for most species since maps are not included in the MFP. Also, the multiple use analysis indicates that Habitat Management Plans for important species will be developed and will ID crucial habitats. To my knowledge, this was never done. Muskox and caribou distribution has changed substantially since the MFP was written. We are addressing permits on a case-by-case basis and attempting to mitigate any impacts to wildlife habitat.**

**2.2: No. There are few fires in the region. Skip is planning on reviewing the fire management options in the NW next year. To my knowledge, no prescribed fires have been done for wildlife habitat improvement in the region. Again the multiple use analysis indicates that HMPs would be developed to identify habitats where burning could be allowed to improve habitat conditions. Other than the Buckland Valley HMP, these plans have never been completed.**

- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?

**Not really. The objectives are vague and not easily measurable. No standards are identified. The Step 3 recommendations are vague.**

**The plan does not meet the requirements of Appendix C for Fish and Wildlife or Fire Management.**

- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.

**The desired outcomes are not really described. No mitigation measures are identified.**

**WT 2.1: Crucial habitats are not identified, so it is hard to determine if the desired outcome is being met. I think we have maintained wildlife habitat in the NW but primarily because, there are few competing demands on the resource.**

**WT2.2: The desired outcome is to reduce fire suppression costs while improving wildlife habitat. Since areas where fire would be beneficial to wildlife have not been identified, it is hard to say if this is being met. Also, there have been few fires in the region since the plan was written.**

- (4) Do decisions continue to be correct or proper over time?

**WT 2.1 No. The plan does not meet the requirements of Appendix C for Fish and Wildlife.**

**WT 2.2 No. It is not in conformance with Federal Wildland Fire Management Policy. This decision should be under a Fire Management Section which is missing from the Plan. It does not meet requirements of Appendix C for Fire Management.**

- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?

**Yes. The Seward Peninsula Muskox Cooperators Plan was approved in 1994. A planning effort is currently underway for the Western Arctic Caribou Herd.**

**Alaska Department of Transportation is working on their Northwest Transportation Plan. Planned transportation corridors have the potential for significant impacts on wildlife. DNR Northwest Area Management Plan was adopted in 1989.**

**There are several comprehensive planning efforts for migratory birds such as Partners In Flight Bird Conservation Plans, U.S. National Shorebird Plan, North American Waterfowl Management Plan, North American Colonial Waterbird Plan, and the integration of those and other bird conservation planning efforts through the North American Bird Conservation Initiative.**

- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?

**Yes. Western Arctic caribou have significantly expanded their winter range. The Seward Peninsula muskox population has increased substantially and expanded their range over the entire peninsula.**

- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.

**There are new opportunities and needs that could be best met through a plan revision.**

- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?

**BLM will have a newly revised sensitive species list in a couple of weeks. It adds many new species, particularly of plants and birds. The USFWS is developing a new MOU with BLM and USFS that addresses implementation of the Migratory Bird Treaty Act. Inventory might be one thing needed.**

- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

**Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds. BLM is currently developing an MOU with USFWS to implement the requirements of the EO. Included in these requirements is ensure that Agency plans promote programs and recommendations of comprehensive migratory bird planning efforts such as Partners in Flight, etc.**

**Executive Order on invasive species management.**

**The plan is not in conformance with the Federal Wildland Fire Management Policy**

**BLM-Alaska Statewide Land Management Standards and Guidelines.**

## Evaluation Worksheet

**Issue:**

Wildlife-Terrestrial: Objective 3

**ROD Reference:**

WT- 3.1

**Proposed Actions:**

3.1- Recommendation was dropped

2. Are actions outlined in the plan being implemented?  
**There are no actions outlined in the plan as the recommendation was dropped.**
- (2) Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?  
**No**
- (3) Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? This determination is often made based on information obtained from resource assessments.  
**No. The recommendation was dropped.**
- (4) Do decisions continue to be correct or proper over time?  
**No. The plan does not meet the requirements of Appendix C for Special Status Species.**
- (5) Have there been significant changes in the related plans of Indian tribes, State or local governments, or other Federal agencies?  
**DOT Northwest Transportation plan under development has the potential to affect special status species. Native Corporations and local governments probably have plans. DNR Northwest Area Management Plan was adopted in 1989.**
- (6) Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?  
**New BLM sensitive species list for Alaska.**
- (7) Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? Note: ACEC's must be designated through the land use planning process.  
**Yes. Special Status Species are not addressed in the MFP.**

- (8) Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)? **Possibly due to the new sensitive species list for Alaska and Migratory Bird Treaty Act MOU with USFWS.**
- (9) Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan? **Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds and MOU with USFWS on implementing the Migratory Bird Treaty Act.**

**BLM Alaska revised Sensitive Species list.**

**BLM-Alaska Statewide Land Management Standards and Guidelines**